

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SRI INTERNATIONAL, INC.,)
a California Corporation,)
)
Plaintiff and)
Counterclaim-Defendant,)
)
v.)
) C. A. No. 04-1199 (SLR)
INTERNET SECURITY SYSTEMS, INC.,)
a Delaware Corporation, INTERNET)
SECURITY SYSTEMS, INC., a Georgia)
Corporation, and SYMANTEC)
CORPORATION, a Delaware Corporation,)
)
Defendants and)
Counterclaim-Plaintiffs.)

**NOTICE OF DEPOSITION OF SYMANTEC CORPORATION
PURSUANT TO FRCP 30(B)(6)**

TO ALL PARTIES HERETO AND THEIR ATTORNEYS OF RECORD:

Please take notice that pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendants Internet Security Systems, Inc., a Delaware corporation, and Internet Security Systems, Inc., a Georgia corporation, (collectively, "ISS") by its counsel, will take the deposition by oral examination of Defendant Symantec Corporation ("Symantec") on the topics set forth in the attached Schedule A, through one or more of Symantec's officers, directors, or managing agents, or other persons designated by Symantec to testify on its behalf, commencing at 9:30 a.m. on March 27, 2006. ISS requests that Symantec provide written notice, at least five business days in advance of the deposition, of: (1) the name(s) of each designee who has consented to testify on behalf of Symantec; (2) the job title of each such person(s); and the topics set forth in Schedule A on which each such person(s) will testify.

The deposition is to take place at the offices of Day, Casebeer, Madrid & Batchelder LLP, 20300 Stevens Creek Blvd., Suite 400, Cupertino, California 95014, or at such alternative dates, times, and places as may be mutually agreed upon by counsel for ISS and Symantec. The deposition shall be recorded by stenographic and videographic means before a notary public or other officer authorized by law to administer oaths, and will continue from day to day until completed, weekends and holidays excepted, with adjournments as to time and place as may be necessary. Some or all of the deposition testimony may involve real-time computer connection between the deposition taker and court reporter using software such as "LiveNote." You are invited to attend.

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Dated: March 15, 2006
 723815

By: /s/ David E. Moore
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INTERNET SECURITY SYSTEMS, INC.,
a Delaware corporation; and
INTERNET SECURITY SYSTEMS, INC.,
a Georgia corporation

SCHEDULE A**I. DEFINITIONS**

These topics are subject to, and incorporate, the following:

1. As used herein, the singular and masculine form of any noun or pronoun shall embrace and be read and applied as embracing the plural, the feminine, and the neuter, except where circumstances clearly make it inappropriate.
2. As used herein, "all" means "any and all;" "any" means "any and all."
3. As used herein, "and" and "or" encompass both "and" and "or," and references shall be construed either as singular or plural, as necessary to bring within the scope of these requests any information or documents that might otherwise be construed to be outside their scope.
4. As used herein, "communication" means any transmission of information from one entity to another, including by personal meeting, memorandum, telephone, facsimile, electronic mail, instant message, internet relay chat, news group, and teleconference.
5. As used herein, "concerning" means analyzing, addressing, consisting of, constituting, regarding, referring to, relating to, refuting, discussing, describing, evidencing, memorializing, reflecting, commenting on, or otherwise having any logical or factual connection to the subject matter of the topic.
6. As used herein, "document" shall include the broadest meaning provided by Fed. R. Civ. P. 26 and 34, all things which come within the meaning of the terms "writings and recordings" used in Fed. R. Evid. 1001, and tangible items such as research and development samples, prototype devices and production samples. "Documents" may be stored in either hardcopy or electronic form. Electronic documents include electronic mail and computer code in

any form. A draft, translation or non-identical copy, such as a copy containing comments or notations, is a separate document within the meaning of this term.

7. As used herein, "including" means "including but not limited to."

8. As used herein, "Symantec" means Defendant Symantec Corporation and the following entities, whether active or retired, full-time or part-time, current or former, compensated or not: its directors, trustees, officers, employees, advisory board members, consultants, agents, attorneys, accountants, representatives, servants, partners, corporate parents, subsidiaries, divisions, predecessors, successors, affiliates, and any joint ventures to which it is or was a party.

9. As used herein, "product" means any product, software, system, method or service, whether commercialized or not.

10. As used herein, "ManHunt" means the Symantec software products marketed under the trade name "ManHunt."

11. As used herein, "Network Security" means the Symantec software products marketed under the trade name "Network Security."

12. As used herein, "7100 Series" means the Symantec products marketed under the trade name "7100 Series" that contain network intrusion detection functionality.

13. As used herein, "iForce" means the Symantec products marketed under the trade name "iForce" that contain network intrusion detection functionality.

14. As used herein, "5400 Series" means the Symantec products marketed under the trade name "5400 Series" that contain network intrusion detection functionality.

15. As used herein, "Blackbird" means any Symantec products that include the "Blackbird" software module.

16. As used herein, "you" and "your" means Symantec.

II. TOPICS FOR DEPOSITION

1. The market share, annual revenue, and profitability achieved by ManHunt, Network Security, the 7100 Series, iForce, the 5400 Series, and Blackbird for each year from 1995-2005.

2. The features of ManHunt, Network Security, the 7100 Series, iForce, the 5400 Series, and Blackbird driving customer demand for ManHunt, Network Security, the 7100 Series, iForce, the 5400 Series, and Blackbird for each year from 1995-2005.

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CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on March 15, 2006, the foregoing document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

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I hereby certify that on March 15, 2006, I have Electronically Mailed the attached document to the following non-registered participants:

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